## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MERCURY PUBLIC AFFAIRS LLC, and MPA HOLDINGS INC.

Plaintiffs,

Case No. 1:21-cv-08300-VSB

-against-

FABIAN NUNEZ, and KIRILL GONCHARENKO,

Defendants.

## NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

PLEASE TAKE NOTICE that pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiffs Mercury Public Affairs LLC and MPA Holdings Inc. hereby voluntarily dismiss all their claims in the above-captioned action without prejudice and without costs to any party, as to Defendants Fabian Nunez and Kirill Goncharenko, and request that the case be closed.

Defendants have not answered or moved for summary judgment.

Dated: November 3, 2021 New York, New York

/s/ Jeff G. Hammel

Joseph B. Farrell Nima H. Mohebbi Sarah F. Mitchell

LATHAM & WATKINS LLP

355 South Grand Avenue, Suite 100

Los Angeles, CA 90071 Tel: (213) 485-1234 Fax: (213) 891-8763

E-mail address: Joe.Farrell@lw.com

Nima.Mohebbi@lw.com Sarah.Mitchell@lw.com Jeff G. Hammel
Justin S. Kirschner
LATHAM & WATKINS LLP

1271 Avenue of the Americas

New York, NY 10020 Tel: (212) 906-1200 Fax: (212) 751-4864

E-mail address: Jeff.Hammel@lw.com Justin.Kirschner@lw.com

Attorneys for Plaintiffs